

### **REMARKS**

The Final Rejection has been carefully reviewed. Claims 1-30 are pending. Claims 1, 5-14, 16, 17, 19-22, 24, 25, 27 and 29 have been amended. Claims 5-14, 19-22 and 24 have been amended to refer to prior claims in the alternative. Claims 1, 16, 25, 27 and 29 have been amended to claim that the each of the first reactants and the second reactants are heated to a temperature of about 200°C to about 250°C and maintained at that temperature from about 5 1/2 hours to 13 hours under vacuum as required to maintain reflux; and that the weight of a polypropylene sample increases less than about 5 wt.% through absorption of the composition following exposure of the polypropylene and the composition at a temperature of about 80°C after a period of four weeks. Support for the amendments to claims 1, 16, 25, 27 and 29 can be found in the Specification as originally filed at least at Paras. [0051] and [0063]. *See* U.S. Patent Application Publication US 2007/0275864 A1.

Claims 26, 28 and 30 have been objected to based on the status identifiers. *See* Final Rejection at ¶ 2. Claims 5-14, 19-22 and 24 have been objected to under 37 C.F.R. § 1.75(c) as allegedly being in improper form because a multiple dependent claim should refer to other claims in the alternative only. *See id.* at ¶ 3. The Amendment filed November 18, 2010 has been objected to under 35 U.S.C. § 132(a) as allegedly introducing new matter into the disclosure. *See id.* at ¶ 4. Claims 1-30 have been rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement as containing subject matter not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. *See id.* at ¶ 6. Claims 1-24 have been rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over U.S. Patent No. 4036771 to Denis *et al.* (“Denis”) in view of U.S. Patent No. 3071546 to Tuyle (“Tuyle”). *See id.* at ¶ 9. Claims 25-30 have been rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over U.S. Patent No. 6010984 to Heimann *et al.* (“Heimann”) in view of Denis in further view of Tuyle. *See id.* at ¶ 10. Applicants respond as follows.

#### **I. Withdrawal of Objections and Rejections from Office Action dated March 18, 2010.**

Applicants thank the Examiner for withdrawing the objections to the specification and the rejections under 35 U.S.C. § 112, and the rejections under 35 U.S.C. §§ 102 and 103 over Denis

and Heimann in view of Denis.

## **II. Information Disclosure Statement.**

Applicants thank the Examiner for considering the English language abstract for foreign patent EP0541007 and marking it as of record in the Application.

## **III. Objections to the Claims.**

### **A. Objections to Status Identifiers.**

Claims 26, 28 and 30 have been objected to based on the status identifiers. *See* Final Rejection at ¶ 2. Applicants have corrected the status identifiers of these claims and respectfully request that this objection be withdrawn.

### **B. Objections under 37 C.F.R. § 1.75(c).**

Claims 5-14, 19-22 and 24 have been objected to under 37 C.F.R. § 1.75(c) as allegedly being in improper form because a multiple dependent claim should refer to other claims in the alternative only. *See* Final Rejection at ¶ 3.

Claims 5-14, 19-22 and 24 have been amended to place the claims in proper multiple dependent form. Specifically, claims 5-14, 19-22 and 24 have been amended to refer to other claims in the alternative only per MPEP § 608.01(n). Applicants respectfully request that the objection to claims 5-14, 19-22 and 24 under 37 C.F.R. § 1.75(c) be withdrawn in view of the claim amendments.

## **IV. Rejection under 35 U.S.C. § 132(a).**

The Amendment filed November 18, 2010 has been objected to under 35 U.S.C. § 132(a) as allegedly introducing new matter into the disclosure. *See* Final Rejection at ¶ 4. Specifically, the Examiner states that “[t]he added material which is not supported by the original disclosure is in amended claims 1, 16, 25, 27 and 29 from which all other claims depend. The claim states in pertinent part; ‘maintained at that temperature from about 5 hours’ and separately, ‘wherein further polypropylene increases about 5 wt% or less through absorption of the composition’ when looking to the specification there is no mention of such limitations. Paragraph [0051] of the instant specification discusses the reaction mixture being maintained for 5 1/2 hours but does not recite about 5 hours, and Paragraphs [0063]-[0064] of the instant specification discuss ester-polypropylene compatibility and 5.06 is the lowest number representing polypropylene increase.” *See id.* (emphasis in original).

Applicants have amended claims 1, 16, 25, 27 and 29 to include the limitations that the each of the first reactants and the second reactants are heated to a temperature of about 200°C to about 250°C and maintained at that temperature from about 5 1/2 hours to 13 hours under vacuum as required to maintain reflux; and that the weight of a polypropylene sample increases less than about 5 wt.% through absorption of the composition following exposure of the polypropylene and the composition at a temperature of about 80°C after a period of four weeks. Support for the amendments to claims 1, 16, 25, 27 and 29 can be found in the Specification as originally filed at least at Paras. [0051] and [0063]. *See* U.S. Patent Application Publication US 2007/0275864 A1. Applicants respectfully submit that these limitations are supported by the Specification as originally filed. Para. [0051] discloses an example of preparation of an ester in which the reactants were maintained at a temperature of 220°C for 5 1/2 hours and held under vacuum. Para. [0063] discloses a test for determining compatibility of ester blends according to the invention and polypropylene. Individual strips of polypropylene were maintained in exposure to the ester blends at a temperature of 80°C for 4 weeks. The first blend showed an increase in the polypropylene weight of 4.93% after 4 weeks; the second blend showed an increase in the polypropylene weight of 4.88% after 4 weeks; and the third blend showed an increase in the polypropylene weight of 4.90% after 4 weeks. The weight of each of these polypropylene samples thus increased less than about 5 wt.% through absorption of the composition following exposure of the polypropylene and the composition at a temperature of about 80°C after a period of four weeks.

Accordingly, Applicants respectfully submit that claims 1, 16, 25, 27 and 29 as amended are supported by the Specification as filed and request that these rejections be withdrawn.

**V. Rejection under 35 U.S.C. § 112, First Paragraph.**

Claims 1-30 have been rejected under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement as containing subject matter not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. *See id.* at ¶ 6. Specifically, the Examiner states that “[t]he added material which is not supported by the original disclosure is in amended claims 1, 16, 25, 27 and 29 from which all other claims depend. The claim states in pertinent part; ‘maintained at that temperature from

about 5 hours’ and separately, ‘wherein further polypropylene increases about 5 wt% or less through absorption of the composition’ when looking to the specification there is no mention of such limitations. Paragraph [0051] of the instant specification discusses the reaction mixture being maintained for 5 1/2 hours but does not recite about 5 hours, and Paragraphs [0063]-[0064] of the instant specification discuss ester-polypropylene compatibility and 5.06 is the lowest number representing polypropylene increase.” *See id.* (emphasis in original).

Applicants respectfully submit that these rejections should be withdrawn in view of the claim amendments as discussed with respect to the rejection under 35 U.S.C. § 132(a).

**VI. Rejection under 35 U.S.C. § 103(a).**

Claims 1-24 have been rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over Denis in view of Tuyle. *See* Final Rejection at ¶ 9. Claims 25-30 have been rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over Heimann in view of Denis in further view of Tuyle. *See id.* at ¶ 10. Applicants respond as follows.

The U.S. Patent & Trademark Office issued Guidelines in 2007 and a later update regarding the reasoning required to support an obviousness determination. *See* Examination Guidelines Update: Developments in the Obviousness Inquiry after *KSR v. Teleflex*, 1358 OG 372-404. The 2007 KSR Guidelines noted that the teaching-suggestion- motivation (TSM) test was but one possible approach in making such a determination, and they identified the following six other rationales that could also be used:

- (1) combining prior art elements according to known methods to yield predictable results;
- (2) simple substitution of one known element for another to obtain predictable results;
- (3) use of a known technique to improve similar devices, methods, or products in the same way;
- (4) applying a known technique to a known device, method, or product ready for improvement to yield predictable results;
- (5) obvious to try - choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success; and
- (6) known work in one field of endeavor may prompt variations of it for use in either the same field or a different one based on design incentives or other market forces if the variations are predictable to one of ordinary skill in the art.

**A. Claims 1-24 over Denis in view of Tuyle.**

Claims 1-24 have been rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over Denis in view of Tuyle. *See* Final Rejection at ¶ 9. Specifically, the Examiner states:

Denis discloses a composition comprising a mixture of complex ester oils (Col. 2/L. 55-57) wherein each ester oil is the result of esterification of a trimer and dimer acid with a dihydroxyl compound and a monohydroxyl compound (as recited in claims 1-2 and 16) (Col. 1-2/L. 51-54). Denis discloses that the dimer and trimer acids results from the dimerization or trimerization of unsaturated fatty acids wherein the dimerization or trimerization can be followed by a hydrogenation operation (as recited in claims 4 and 18) (Col. 3/L. 12-18). Denis discloses that the dihydroxyl compounds include ethylene glycol and neopentyl glycol (as recited in claims 7-9 and 23) (Col. 4/L. 12-24) and the monohydric alcohols include isotridecanol and 2-ethylhexanol (as recited in claims 5-6, 10-11, 19-21 and 23) (Col. 4/L. 25-35). Denis also discloses that the compositions of the invention can result from esterification of mixtures in varying proportions of dimeric + trimeric acids and monocarboxylic acids by a polyalkylene glycol, the proportions of the reagents then being such that to 1 mole of acid (dimeric + trimeric) there substantially corresponds 2 moles of polyalkylene glycol and the number of moles of monocarboxylic acid necessary to esterify the remaining hydroxyl functions. It would have been obvious to one of ordinary skill in the art at the time of the invention that the weight ratio of trimer to dimer acid would fall within the range of 80:20 to 20:80 wt% based on the disclosure of Denis (as recited in claims 3 and 17).

Denis discloses both a first and second complex ester wherein the first ester has all the reaction components of the instant claims as does the second ester. Therefore, it is the position of the examiner that the first ester would inherently have a higher viscosity than the second ester as recited in instant claims 12 and 22-23 and that the combination of complex esters would have a viscosity measured at 100°C of about 40 cSt as recited in instant claims 13-16.

Denis discloses the dimers and trimers coming from polymerization of unsaturated fatty acids such as those produced from natural sources including soya beans and linseed oils (Col. 3/L. 12-48). Denis does not, however, explicitly disclose the trimer acids derived from tall oils as recited in claims 1, 16, 25, 27 and 29.

Tuyle discloses a lubricant composition comprising a base oil and additives wherein the reference states that the isostearic acids 70 produced from tall oil, oleic acid, cotton seed oil, soybean oil, etc., are all substantially alike and are not subject to independent identification. It would have been obvious to use either soya oil or tall oil as the source of unsaturated fatty acids as the components are essentially equivalent as disclosed in Tuyle (Col. 3/L. 54-74).

Claims 1 and 16 and the claims which depend therefrom are product by process claims and therefore it is the position of the examiner that “[E]ven though product-by process claims are limited by and defined by the process, determination of patentability is based on the product itself. The patentability of a product does not depend on its method of production. If the product in the product by process claim is the same as or obvious from a product of the prior art, the claim is unpatentable even though the prior product was made by a different process.” In re Thorpe 777 F.2d 695, 698, 227 USPQ 964, 966 (Fed Cir. 1985) and MPEP 2113.

Denis discloses lubricating compositions consisting of homogeneous mixtures of at least one mineral or synthetic hydrocarbon oil of lubricating viscosity; at least one complex ester composition; and optionally at least one light ester. *See* Abstract; Col. 1, lines 24-33. According to Denis, [t]he formulation of multigrade oils from hydrocarbon oils of mineral or synthetic origin generally requires the addition of relatively large amounts of additives which are intended to improve their viscosity index, although they generally suffer from the disadvantage of unsatisfactory heat stability and mechanical stability, under the severe temperature and loading conditions to which oils may be subjected.” *See* Col. 1, lines 6-13. Denis further notes that “[i]t has now been found that some compositions of the complex ester type could advantageously be used as components of lubricating bases for multigrade oils, in mixture with mineral or synthetic hydrocarbon oils.” *Id.* at lines 20-26. Thus, Denis discloses how to increase the viscosity of a multigrade oil by mixing complex esters as a component in mixture with mineral or synthetic hydrocarbon oils.

Tuyle discloses materials to be added to lubricating oils for internal combustion engines. *See* col. 1, lines 9-11. The inventor found that “unsaturated fatty acids which have first been modified by heat treatment, either in the presence or absence of catalyst, to effect a structural rearrangement and then hydrogenated, yield metal salts which are soluble in petroleum oils, are resistant to oxidation and deterioration, and are effective alkaline reserve agents when added to lubricating oils.” *Id.* at col. 2, lines 10-16. Further, “[t]he structurally modified acids are conveniently obtained from the monomeric acids, obtained as **by-products** from the production of dibasic fatty acids such as dimer acids,” as disclosed in U.S. Patent No. 2482761. *Id.* at lines 16-21 (emphasis added). According to one embodiment of the invention, fatty acids containing polyunsaturated acids are heated in excess of 260°C in the presence of water until polymerization

of the polyunsaturated acids is substantially complete. *Id.* at lines 25-37. Next, polymerized acids are separated from unpolymerized acids. *Id.* The unpolymerized acids are mixed monomeric products believed to be saturated fatty acids contained in the original fatty acids, unsaturated acids which have not been polymerized and have not been structurally modified and unsaturated acids which have not been polymerized but have been structurally modified. *Id.* Hydrogenation is conducted on the mixed monomeric products prior to separation of the structurally modified acids from the saturated acids and unchanged unsaturated acids such that unchanged oleic acid or oleic isomers are converted to solid stearic acid. *Id.* at lines 62-68. By converting the unchanged oleic or oleic isomers to solid stearic acid, “it is only necessary to separate solid acids from the liquid structurally modified acids” in order to separate out the structurally modified acids which are used in the invention, such as by the use of solvents. *Id.* at col. 2, lines 10-16; col. 3, line 68 to col. 4, line 1. Co-products of other polymerization methods may also be used in place of the products of the polymerization process previously discussed. *Id.* at col. 3, lines 6-15. In each case, the structurally modified acids may be hydrogenated and solvent separated to produce a hydrogenated liquid, structurally modified acid for production of soaps to be used as lubricant additives according to the invention. *Id.* at lines 16-20.

Applicants first respectfully submit that Denis does not disclose each and every limitation of claims 1-24. Specifically, claims 1 and 16 have been amended to include the limitation that the weight of a polypropylene sample increases less than about 5 wt.% through absorption of the composition following exposure of the polypropylene and the composition at a temperature of about 80°C after a period of four weeks. Many of the complex esters disclosed by Denis do not demonstrate similar compatibility towards polypropylene as do the claimed compositions. *See* Declaration of Lloyd Nelson, ¶ 11, submitted with Amendment and Response, November 18, 2010.

Additionally, Denis does not clearly name the current claimed esters comprising a reaction product of first reactants comprising trimer acid derived from tall oil fatty acids. *See* MPEP § 2131.02 (“A genus does not always anticipate a claim to a species within the genus.”) Denis discloses dimeric and trimeric acids for use in forming its complex ester compositions, and specifically discloses as suitable dimeric or trimeric acids resulting from the dimerization or trimerization of the following unsaturated fatty acids:

- tetradecenoic acids (such as myristeleic acid);
- hexadecenoic acids (such as palmitoleic acid);
- octadecenoic acids (such as oleic acid);
- octadecadienoic acids (such as linoleic acid);
- octadecatrienoic acids (such as linolenic acid);
- eicosenoic acids;
- docosenoic acids (such as erucic acid or brassidic acid);
- natural or synthetic mixtures of a plurality of such acids, for example:
- fatty soya bean acids which contain inter alia about 25% of octadecenoic acid, 45% of octadecadienoic acid and 7% of octadecatrienoic acid;
- fatty linseed oil acids which contain inter alia about 20% of octadecenoic acid, 15% of octadecadienoic acid and 50% of octadecatrienoic acid;
- fatty spermaceti oil acids which contain inter alia about 5% of tetradecenoic acid, 15% of hexadecenoic acid, 35% of octadecenoic acid and 1% of octadecadienoic acid;
- fatty colza oil acids which contain inter alia about 18% of octadecenoic acid, 19% of octadecadienoic acid, 8% of octadecatrienoic acid, 6% of eicosenoic acid and 42% of docosenoic acid; and
- di- and tricarboxylic acids resulting from the dimerization or trimerization of hydroxycarboxylic acids such as ricinoleic acid.

*See* col. 3, lines 21-52. Denis' disclosure embraces a large number of species of fatty acids for use as the source of its dimeric and trimeric acids and therefore does not anticipate the present claims to esters comprising a reaction product of first reactants comprising trimer acid derived from tall oil fatty acids. *See In re Meyer*, 599 F.2d 1026, 202 USPQ 175 (CCPA 1979) ("A reference disclosing 'alkaline chlorine or bromine solution' embraces a large number of species and cannot be said to anticipate claims to 'alkali metal hypochlorite.'"); *Akzo N.V. v. Int'l Trade Comm'n*, 808 F.2d 1471, 1 USPQ2d 1241 (Fed. Cir. 1986) ("Claims to a process for making aramid fibers using a 98% solution of sulfuric acid were not anticipated by a reference which disclosed using sulfuric acid solution but which did not disclose using a 98% concentrated sulfuric acid solution."); *see also* MPIP 2131.02.



Tuyle is cited by the Examiner as disclosing “a lubricant composition comprising a base oil and additives wherein the reference states that the isostearic acids 70 produced from tall oil, oleic acid, cotton seed oil, soybean oil, etc., are all substantially alike and are not subject to independent identification. It would have been obvious to use either soya oil or tall oil as the source of unsaturated fatty acids as the components are essentially equivalent as disclosed in Tuyle (Col. 3/L. 54-74).” Final Rejection at ¶ 9. Applicants respectfully submit that Tuyle does not support the assertion that fatty acids produced from tall oil are the equivalent of fatty acids from other sources such as soy bean oil. Accordingly, claims 1 and 16 are not rendered obvious over Denis in view of Tuyle.

Specifically, the disclosure in Tuyle of “isostearic acid” does not teach or suggest the equivalence of soy bean oil and tall oil as the source of unsaturated fatty acids in Denis in forming a complex ester. Rather, Tuyle discloses only equivalence of the **by-products** or **co-products** of the polymerization of soy bean oil and tall oil, **not** equivalence of the **polymerization products** themselves.

According to Tuyle, “isostearic acid” can be used to prepare the lubricants of the invention of Tuyle in addition to the monomeric acids, obtained as **by-products** from the production of dibasic fatty acids such as dimer acids,” as disclosed in U.S. Patent No. 2482761. *See* col. 2, lines 16-21. “Isostearic acid” is described by Tuyle as a structurally stabilized fatty acid obtained by the methods disclosed in U.S. Patent Nos. 2793219, 2793220 and 2812342. *See* col. 3, lines 6-16; 28-31; 50-53. “Isostearic acid” is prepared from the **co-product** that is produced by the heating of methyl and ethyl esters, or esters or acids, in the presence of clay. *See id.* This co-product undergoes hydrogenation and solvent separation, and is described as a hydrogenated liquid, structurally modified acid. *See id.* Notably, “isostearic acid” is **not** prepared from the **polymerization product** of the esters or acids. *See id.* Finally, Tuyle states that U.S. Patent No. 2812342 discloses that “**neither the nature of the raw material which is polymerized nor the process** used **greatly affects** the physical or chemical **characteristics of the co-products** remaining after hydrogenation and solvent separation.” *Id.* at col. 3, 24-28 (emphasis added).

Tuyle thus discloses **only** that soy bean oil and tall oil are essentially equivalent starting materials with regard to the **co-product** that is produced after heating the soy bean oil or tall oil

in the presence of clay according to the methods disclosed in U.S. Patent Nos. 2793219, 2793220 and 2812342 – Tuyle makes **no assertion whatsoever** regarding the similarity or equivalence of the **polymerized product** of these methods themselves.

There is nothing in Tuyle that teaches or suggests that the polymerization products of soy bean oil and tall oil would render similar or equivalent complex ester compositions when used in the process disclosed in Denis, and specifically Tuyle provides no teaching or suggestion whatsoever that these polymerization products have similar polypropylene compatibility. There would be no reasonable expectation of success to substitute tall oil for soy bean oil in Denis based on the disclosure of Tuyle, and neither would such a substitution be expected to give predictable results, particularly with respect to polypropylene compatibility.

Accordingly, Applicants respectfully submit that Denis in view of Tuyle does not render claims 1 and 16, or claims 2-15 and 17-24, as amended, obvious and request that these rejections be withdrawn.

**B. Claims 25-30 over Heimann in view of Denis in further view of Tuyle.**

Claims 25-30 have been rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over Heimann in view of Denis in further view of Tuyle. *See* Final Rejection at ¶ 10. According to the Examiner:

Heimann discloses a lubricant composition for optical fiber cables (Col. 9/L. 31) comprising a silica/silicate mixture (see Abstract), a base oil and a thickener.

Heimann discloses base oil that include synthetic esters (Col. 3/L. 8-17), but Heimann does not explicitly disclose a mixture of complex esters that include the reaction components of a trimer acid, a polyhydric alcohol and a monohydric alcohol.

Denis/Tuyle disclose a composition comprising a mixture of complex ester oils (Col. 2/L. 55-57) wherein each ester oil is the result of esterification of a trimer and dimer acid with a dihydroxyl compound and a monohydroxyl compound (Col. 1-2/L. 51-54). Denis discloses that the dihydroxyl compounds include ethylene glycol and neopentyl glycol (Col. 4/L. 12-24) and the monohydric alcohols include isotridecanol and 2-ethylhexanol (Col. 4/L. 25-35).

Denis discloses both a first and second complex ester wherein the first ester has all the reaction components of the instant claims as does the second ester.

Therefore, it is the position of the examiner that the first ester would inherently have a higher viscosity than the second ester and that the combination of complex esters would have a viscosity measured at 100°C of about 40 cSt. Tuyle discloses that unsaturated fatty acids derived from either soya bean oils as disclosed in Denis or tall oils as recited in the instant claims are essentially the same.

It would have been obvious to one of ordinary skill in the art at the time of the invention to use the complex ester composition of Denis/Tuyle in the composition of Heimann in order to enhance the anti-scuffing properties and reduce the coefficient of friction of the composition (Col. 9/L. 29-35 of Denis).

Claims 25, 27 and 29 and the claims which depend therefrom are product by process claims and therefore it is the position of the examiner that “[E]ven though product-by-process claims are limited by and defined by the process, determination of patentability is based on the product itself. The patentability of a product does not depend on its method of production. If the product in the product by process claim is the same as or obvious from a product of the prior art, the claim is unpatentable even though the prior product was made by a different process.” In re Thorpe 777 F.2d 695, 698, 227 USPQ 964, 966 (Fed Cir. 1985) and MPEP 2113.

Applicants respectfully submit that for all the reasons previously discussed with respect to the rejection of claims 1-24, Denis in view of Tuyle does not render claims 25-30 obvious. Specifically, there is nothing in Denis and Tuyle, either alone or in combination, that would indicate that the polymerization products of soy bean oil and tall oil would render similar or equivalent complex ester compositions when used as the starting materials in the process disclosed in Denis. There would be no reasonable expectation of success to substitute tall oil for soy bean oil in Denis based on the disclosure of Tuyle to prepare complex ester compositions based on Tuyle’s assertion that the **by-products** of the polymerization of these starting materials, after hydrogenation and solvent separation, are equivalent. There is likewise no reason to expect that such a substitution be expected to give products with similar polypropylene compatibility. Heimann does not cure this deficiency. Accordingly, Applicants respectfully submit that none of Denis, Tuyle and Heimann, whether alone or in combination, render claims 25-30, as amended, obvious and request that these rejections be withdrawn.

**Conclusion**

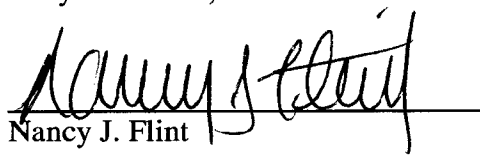
Applicants respectfully submit that claims 1-30 are in condition for allowance and request allowance of the same.

This Amendment after Final Rejection has been filed within two (2) months of the mailing date of the Final Rejection and it is believed that no fees are due upon filing. If any fees are determined to be due, the Commissioner is hereby authorized to charge such fees to Deposit Account No. 50-4222.

Respectfully submitted,

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